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Attorney for Defendants

“Doe Klim” and “Doe Skywalker”

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO/OAKLAND DIVISION

ART OF LIVING FOUNDATION, a
California corporation,

Plaintiff,

v.

DOES 1-10, inclusive,

Defendants.

Case No.: CV 10-5022-LB

**SECOND DECLARATION OF
DOE/KLIM**

Date: December 8, 2011

Time: 1:30 pm

Judge: Hon. Lucy H. Koh

Courtroom: 4

1 I, _____[name redacted] , declare as follows:

2 1. I am not a citizen of the United States and I do not reside in the United States. I do not
3 have a contractual relationship with the AOL Foundation of the United States (Plaintiff). Under the
4 pseudonyms Klim and AOL-Free, I am the creator of the “Leaving the Art of Living” (“LAOL”) Blog.
5

6 2. I was an AOL teacher for many years and in that capacity had access to the documents
7 that are claimed to be trade secrets in this case.

8 3. I never signed or otherwise agreed to a nondisclosure agreement or confidentiality
9 agreement of any kind with AOL FUS or with any other AOL entity.

10 I declare under penalty of perjury under the laws of the State of California and the United
11 States of America that the foregoing is true and correct.

12 Executed on September 12, 2011 at _____[place redacted].

13
14 *I attest that I have on file a copy of the original signed version of this Declaration. I have redacted*
15 *identifying information herein to avoid prejudice to the right of the Declarant to anonymity.*
16

17 Dated: September 12, 2011

_____/s/_____
Joshua Koltun
Attorney for Defendants
Doe/Klim and Doe/Skywalker